

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

LISA JACKSON,

Plaintiff,

V.

CENTRAL PORTFOLIO CONTROL, INC.,

Defendant.

CIVIL ACTION NO.: 3:22-cv-2635

NOTICE OF REMOVAL

Central Portfolio Control, Inc. ("CPC" "Defendant") files this Notice of Removal from the Justice Court, Precinct 3, Place 1 of Dallas County, Texas to the United States District Court for the Northern District of Texas, Dallas Division. In support of this Notice of Removal, the CPC states as follows:

1. On October 7, 2022, Plaintiff Lisa Jackson (“Plaintiff”) filed an action in the Justice Court, Precinct 3, Place 1, County of Dallas, State of Texas, entitled and captioned: Lisa Jackson v. Central Portfolio Control, Inc., and assigned Docket No. JS22-00728A. A copy of the notice and complaint is attached and marked as Exhibit "1".

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court pursuant to 28 U.S.C. § 1441(b) in that it presents a federal question, in that Plaintiff alleges violations of 15 U.S.C. § 1692 et seq., the Fair Debt Collection Practices Act (“FDCPA”).

3. CPC received the Summons and Complaint on October 26, 2022. This removal is timely pursuant to 28 U.S.C. § 1446(b).

4. To the best of the undersigned's knowledge, other than CPC's general denial, no other pleadings or documents, other than the documents attached hereto, have been filed in this matter.

5. As required by 28 U.S.C. § 1446(d), CPC will give notice of the filing of this notice to the Plaintiff and to the clerk of the Justice Court, Precinct 3, Place 1, County of Dallas, State of Texas, where the action is currently pending.

WHEREFORE, CPC respectfully request that the above captioned matter currently pending in the Justice Court, Precinct 3, Place 1, County of Dallas, State of Texas, be removed to this Honorable Court.

Respectfully submitted,

By: /s/ Michael S. Poncin
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CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2022, the foregoing Notice of Removal was e-mailed
and mailed via first class mail to:

Shakeria Northcross, Esq.
Jaffer & Associates PLLC
5757 Alpha Road, Suite 430
Dallas, TX 75240
attorneys@jaffer.law
Attorneys for Plaintiff

By: /s/ Michael S. Poncin
Michael S. Poncin